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Attorneys for Plaintiff, Matthew Alexander,
for himself and other members of the general
public similarly situated

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Matthew Alexander,

Plaintiff,

vs.

GNLV, Corp.

GNL, Corp.,

Defendants.

Docket No. 2:13-cv-02005-LDG-CWH

**PLAINTIFF'S MOTION TO
FILE UNDER SEAL
PLAINTIFF MATTHEW
ALEXANDER'S MEMORANDUM IN
SUPPORT OF HIS MOTION TO
COMPEL**

Plaintiff Matthew Alexander, for himself and other members of the general public similarly situated, by and through undersigned counsel hereby moves the Court for an entry of an Order to file under seal Plaintiff Matthew Alexander's Memorandum in Support of His Motion to Compel. As support for this Motion, Plaintiff states as follows:

1 1. The parties have agreed to abide by the terms of a proposed protective order, until
2 such time as the parties seek and receive an Order from the Court stating otherwise or the parties
3 come to a different agreement.

4 2. Pursuant to the terms of the proposed protective order, parties that produce
5 documents and/or provide deposition testimony in this litigation are permitted to designate their
6 documents or deposition transcripts as “Confidential”, “Confidential – Attorney’s Eyes Only” or
7 “Confidential Personal Information.”
8

9 3. Defendants have produced documents and/or deposition transcripts as
10 Confidential, Confidential – Attorney’s Eyes Only or Confidential Personal Information.

11 4. Plaintiff is filing a Memorandum in Support of His Motion to Compel Deposition
12 which contains information designated as Confidential, Confidential – Attorney’s Eyes Only or
13 Confidential Personal Information. In order to comply with the terms of the proposed protective
14 order, Plaintiff requests that the Court allow Plaintiff’s Memorandum to be filed under seal.
15

16 5. Plaintiff believes that the burden is on the Defendants to establish that the
17 information designated as Confidential, Confidential – Attorney’s Eyes Only or Confidential
18 Personal Information pursuant to the agreement is entitled to heightened protection. Nonetheless,
19 Plaintiff requests that the Court file under seal Plaintiff Matthew Alexander’s Memorandum in
20 Support of His Motion to Compel so that Plaintiff can comply with the parties’ agreement.
21

22 6. Accordingly, Plaintiff respectfully requests that the Court enter an Order filing
23 Plaintiff Matthew Alexander’s Memorandum in Support of His Motion to Compel under seal.

24 ...

25 ...

26 ...
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28

1 Dated: October 24, 2014

STUEVE SIEGEL HANSON LLP

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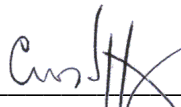
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ATTORNEYS FOR PLAINTIFFS

ORDER

24 It is so ordered.

26 
27 _____
28 U.S. Magistrate Judge
Dated: 10/27/2014

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on October 24, 2014, a copy of the foregoing document was served via email to the following:

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